

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA
CASE NUMBER: 1:18-CV-932**

COVIL CORPORATION, by and
through its duly appointed receiver, Peter
D. Protopapas,

v.

ZURICH AMERICAN INSURANCE
COMPANY and USF&G COMPANY

**JOINT STATUS REPORT
BETWEEN THE RECEIVER FOR
COVIL AND ZURICH**

Peter D. Protopapas, the Receiver for Covil Corporation (the “Receiver”), an administratively-revoked South Carolina corporation, and Zurich American Insurance Company (“Zurich”) file this Joint Status Report to provide an update regarding the status of their settlement.

Earlier today, the South Carolina receivership court approved the settlement between the Receiver for Covil and Zurich. A copy of the approval order is attached hereto as Exhibit A. According to the terms of that agreement (and consistent with past practice for similar settlements in this case), the Receiver and Zurich will immediately file a dismissal, without prejudice, of all claims pending between them in this Court. Zurich will also file a dismissal, without prejudice, of any and all remaining claims for declaratory relief against any and all remaining parties. After the Zurich settlement is finalized and funded, the Receiver and Zurich will jointly file a request that these respective dismissals be converted into dismissals with prejudice.¹

¹ The Receiver is concerned that USF&G will somehow challenge or appeal the approval of this settlement with Zurich (as USF&G has done with other settlements reached by the Receiver). As such, the Zurich settlement agreement is designed to become final after any such challenges by USF&G have concluded.

Dated: January 15, 2021

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CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing brief via the Court's electronic filing system, pursuant to the Electronic Filing Procedures, on all attorneys of record who have entered an appearance by ECF in this matter.

This the 15th day of January, 2021.

/s/ Brady Edwards
Brady Edwards